

2 to G

(83)

1-21-03

Sc

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JEFFREY D. ALBRIGHT, NORMAN T. )  
BOIRE, GARY M. DIETZ, WILLIAM H. )  
ERDMAN, MICHAEL W. FRITZ, )  
A. RONALD FROMBAUGH, RALPH A. )  
HARRIS, ALLEN W. LANDIS, LOWELL )  
MCGUIRE, WALTER R. MINICH, )  
RAYMOND C. NEVINS, STANLEY L. NYE, )  
VINCENT RAMIREZ, JR., KEITH E. )  
SCRIGNOLI, RAY G. SNYDER, JR., and )  
LAWRENCE D. WELKER, )

Plaintiffs )

v. )

DANIEL A. VIRTUE, Business Agent of the )  
International Brotherhood of Teamsters; )  
INTERNATIONAL BROTHERHOOD OF )  
TEAMSTERS; LOCAL 776, INTERNATIONAL )  
BROTHERHOOD OF TEAMSTERS; ABF )  
FREIGHT SYSTEM, INCORPORATED, )  
Defendants )

**FILED**  
HARRISBURG, PA

JAN 17 2003

MARY E. DIANDREA, CLERK  
Per                      Deputy Clerk

Case No. 1:CV-00-878

Judge Sylvia H. Rambo ✓

**ERRATA SHEET FOR PLAINTIFFS' RESPONSE TO DEFENDANT  
UNION'S STATEMENT OF MATERIAL FACTS**

Please be advised that the following changes were not made to the *Plaintiffs' Response to Defendant Union's Statement of Material Facts* before being submitted to this Honorable Court.

Please note the changes are as follows:

1. Page 4, Item #4, after the sentence, "...employees by seniority dates." please insert  
"(Seniority Roster – Plaintiffs Ex. 6)".
2. Page 4, Item #5, after the sentence, "...of article 5 does not do so." please insert  
"(Article 5, Section 5 – Plaintiffs Ex. 1)".
3. Page 5, Item #7, in the sentence, "...as noted by the Circuit Court..." please insert a  
comma after "Court" and strike "The" and insert "the".

4. Page 5, Item #7, after the sentence, "...parties to this lawsuit." please insert "(See Albright remand discussing agency and evidentiary relevance (Decision of Third Circuit Court – See Plaintiffs Ex. 5))".

Date:

1/17/03

By:



Robert S. Mirin, Esquire

ID# 25305

**AHMAD & MIRIN**

2515 North Front Street

Harrisburg, PA 17110

(717) 909-4343

**CERTIFICATE OF SERVICE**

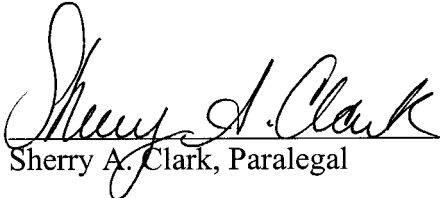
I, Sherry A. Clark, hereby certify that on this 14<sup>th</sup> day of January, 2003, a copy of *Errata Sheet for Plaintiffs' Response to Defendant Union's Statement of Material Facts* was served via first-class mail, postage prepaid, on the following:

Joseph E. Santucci, Jr.  
Robyn Weiss  
MORGAN, LEWIS & BOCKIUS, L.L.P.  
1111 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Vincent Candiello  
MORGAN, LEWIS & BOCKIUS, L.L.P.  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101

Ira Weinstock  
Jason Weinstock  
IRA WEINSTOCK, P.C.  
800 N. 2<sup>nd</sup> Street  
Harrisburg, PA 17102

James A. McCall  
Special Counsel  
INTERNATIONAL BROTHERHOOD OF TEAMSTERS  
25 Louisiana Avenue, N.W.  
Washington, DC 20001

  
Sherry A. Clark, Paralegal